

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: 2020 MCGOWEN, LLC DEBTOR	§ § § § §	CASE NO. 17-32788 CHAPTER 7
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MOTION TO CONVERT FROM CHAPTER 7 CASE TO CHAPTER 11 CASE

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

This pleading requests relief that may be adverse to your interests.

If no timely response is filed within twenty-one (21) days from the date of service, no hearing will be held and the relief requested in the motion may be granted without a hearing being held.

A timely filed response is necessary for a hearing to be held.

COMES NOW, 2020 MCGOWEN, LLC, Debtor in the above-captioned and numbered bankruptcy proceeding and files this Motion to Convert from Chapter 7 Case to Chapter 11 Case and would respectfully show unto this Court the following:

1. On May 1, 2017 Debtor filed a voluntary petition under Chapter 7 of the Bankruptcy Code.
2. A meeting of creditors has not yet been held.
3. No prior conversions have been entered in this case.
4. The Debtor is eligible under section 109 of the Bankruptcy Code to be a Debtor under Chapter 11.
5. Debtor wishes to convert its case to a Chapter 11 Bankruptcy.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that this case be converted to a Chapter 11 Case and for such other and further relief as is just.

Dated: May 25, 2017

Respectfully submitted,

The King Law Firm

/s/ Lee Keller King

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CERTIFICATE OF SERVICE

The below signed hereby certifies that a true and correct copy of the foregoing has been served on all parties via regular US mail and/or the Court's CM/ECF system:

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Dated: May 25, 2017

/s/ Lee Keller King

Lee Keller King